

Exhibit 1

batista007@aol.com

From: batista007@aol.com
Sent: Tuesday, October 6, 2020 8:53 AM
To: 'Alan R. Ackerman'
Subject: RE:

I don't know if that is a better idea or not, because I have been over the same ground with her many times.

She has been in Boston since last week for work, and does not return until tomorrow. I will make it a priority to talk to her on Thursday. Bear in mind that it is her consistent view that she has responded as fully as she can and given you in terms of documents what she can locate. As soon as she returns on Thursday morning I will press her again. It will not be easy – I am a lawyer, not a mind reader, and I am not the FBI and cannot invade her premises for documents, particularly since she insists she has given me what she can locate and unlike you I have no reason to doubt her sincerity.

If, however, I am able to find a way to provide further information, I will let you know.

By the way, I appreciate your willingness to talk over these issues and confer further. However, I had to defer this morning's 8 am call with you because my wife was up half the night with intense pain in her right hip. She will be having hip replacement surgery on Friday and on that basis I will or may request an adjournment of the conference with Magistrate Kuo scheduled for October 9.

From: Alan R. Ackerman <araesq@alanackermanlaw.com>
Sent: Tuesday, October 6, 2020 7:53 AM
To: Paul Batista <batista007@aol.com>
Subject: Re:

I have a better idea. You know what I'm looking for. Talk to Penny and find out what she will and will not produce and get back to me

Alan R. Ackerman, Esq.

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On Oct 6, 2020, at 2:50 AM, Paul Batista <batista007@aol.com> wrote:

We will have to talk later in the day or tomorrow.

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